

ORIGINAL



0000096827

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

COMMISSIONERS

KRISTIN K. MAYES, Chairman

2009 MAY -8 P 4:32

GARY PIERCE

PAUL NEWMAN

AZ CORP COMMISSION

SANDRA D. KENNEDY

DOCKET CONTROL

BOB STUMP

IN THE MATTER OF THE APPLICATION OF
ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION, TO EXEND ITS EXISTING
CERTIFICATE OF CONVENIENCE AND
NECESSITY IN THE CITY OF CASA GRANDE
AND IN PINAL COUNTY, ARIZONA.

Docket No. W-01445A-06-0199

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-05-0926

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-05-0926

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION FO ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-07-0300

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-07-0300

ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION,

Docket No. W-01445A-06-0200

Docket No. SW-20445A-06-0200

Docket No. W-20446A-06-0200

Docket No. W-03576A-06-0200

Docket No. SW-03575A-06-0200

COMPLAINANT,
VS.

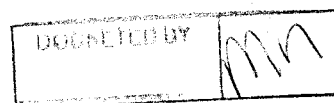
GLOBAL WATER RESOURCES, LLC, A
FOREIGN LIMITED LIABILITY COMPANY;
GLOBAL WATER RESOURCES, INC., A
DELAWARE CORPORATION; GLOBAL
WATER MANAGEMENT, LLC, A FOREIGN

**NOTICE OF FILING
REBUTTAL TESTIMONY**

Arizona Corporation Commission

DOCKETED

MAY - 8 2009



ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

LIMITED LIABILITY COMPANY; SANTA
CRUZ WATER COMPANY, LLC, AN
ARIZONA LIMITED LIABILITY
CORPORATION; PALO VERDE UTILITIES
COMPANY, LLC, AN ARIZONA LIMITED
LIABILITY CORPORATION; GLOBAL WATER
- PALO VERDE UTILITIES COMPANY, AN
ARIZONA CORPORATION; JOHN AND JANE
DOES I-20; ABC ENTITIES I-XX,

RESPONDENTS.

IN THE MATTER OF THE JOINT
APPLICATION OF CP WATER COMPANY
AND FRANCISCO GRANDE UTILITIES
COMPANY TO TRANSFER THEIR
CERTIFICATES OF CONVENIENCE AND
NECESSITY AND ASSETS TO PALO VERDE
UTILITIES COMPANY AND SANTA CRUZ
WATER COMPANY.

Docket No. WS-01775A-07-0485
Docket No. SW-03575A-07-0485
Docket No. W-02442A-07-0485
Docket No. W-03576A-07-0485

**NOTICE OF FILING
REBUTTAL TESTIMONY**

Global Water - Santa Cruz Water Company ("Santa Cruz"), Global Water - Palo Verde
Utilities ("Palo Verde"), CP Water Company and Francisco Grande Utilities Company
(collectively, "Global Utilities") file the Rebuttal Testimony of Graham Symmonds in the above-
mentioned docket.

RESPECTFULLY SUBMITTED this 8th day of May 2009.

ROSHKA DEWULF & PATTEN, PLC

By Timothy J. Sabo
Michael W. Patten
Timothy J. Sabo
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

1 Original + 21 copies of the foregoing
2 filed this 8th day of May 2009 with:

3 Docket Control
4 ARIZONA CORPORATION COMMISSION
5 1200 West Washington
6 Phoenix, Arizona 85007

7 Copies of the foregoing hand-delivered/mailed
8 this 8th day of May, 2009 to:

9 Dwight D. Nodes, Esq.
10 Assistant Chief Administrative Law Judge
11 Hearing Division
12 Arizona Corporation Commission
13 1200 West Washington
14 Phoenix, Arizona 85007

15 Janice Alward, Esq.
16 Chief Counsel, Legal Division
17 Arizona Corporation Commission
18 1200 West Washington
19 Phoenix, Arizona 85007

20 Ernest G. Johnson, Esq.
21 Director, Utilities Division
22 Arizona Corporation Commission
23 1200 West Washington
24 Phoenix, Arizona 85007

25 Robert W. Geake, Esq.
26 Arizona Water Company
27 3805 North Black Canyon Highway
Phoenix, Arizona 85015

Steven A. Hirsch, Esq.
Rodney W. Ott, Esq.
Bryan Cave LLP
Two North Central Avenue, Suite 2200
Phoenix, Arizona 85004

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Mayor Chuck Walton
2 City of Casa Grande
3 510 East Florence Boulevard
4 Casa Grande, AZ 85222
5
6 Ken Franks, Esq.
7 Rose Law Group
8 6613 N. Scottsdale Road, Suite 200
9 Scottsdale, AZ 85250-0001
10
11 Brad Clough
12 Anderson & Barnes 580, LLP
13 Anderson & Miller 694, LLP
14 8501 N. Scottsdale Road, Suite 260
15 Scottsdale, AZ 85253
16
17 Jeffrey W. Crockett, Esq.
18 Marcie Montgomery, Esq.
19 Snell & Wilmer
20 400 East Van Buren Street
21 Phoenix, AZ 85004
22
23 Craig Emmerson
24 Anderson & Val Vista 6, LLC
25 8501 N. Scottsdale Road, Suite 260
26 Scottsdale, AZ 85253
27

By 

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KRISTIN K. MAYES, Chairman

GARY PIERCE

PAUL NEWMAN

SANDRA D. KENNEDY

BOB STUMP

IN THE MATTER OF THE APPLICATION OF
ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION, TO EXEND ITS EXISTING
CERTIFICATE OF CONVENIENCE AND
NECESSITY IN THE CITY OF CASA GRANDE
AND IN PINAL COUNTY, ARIZONA.

Docket No. W-01445A-06-0199

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-05-0926

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-05-0926

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION FO ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-07-0300

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-07-0300

ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION,

Docket No. W-01445A-06-0200

Docket No. SW-20445A-06-0200

Docket No. W-20446A-06-0200

Docket No. W-03576A-06-0200

Docket No. SW-03575A-06-0200

COMPLAINANT,

VS.

GLOBAL WATER RESOURCES, LLC, A
FOREIGN LIMITED LIABILITY COMPANY;
GLOBAL WATER RESOURCES, INC., A

**REBUTTAL TESTIMONY OF
GRAHAM SYMMONDS
IN SUPPORT OF SETTLEMENT**

1 DELAWARE CORPORATION; GLOBAL
2 WATER MANAGEMENT, LLC, A FOREIGN
3 LIMITED LIABILITY COMPANY; SANTA
4 CRUZ WATER COMPANY, LLC, AN
5 ARIZONA LIMITED LIABILITY
6 CORPORATION; PALO VERDE UTILITIES
7 COMPANY, LLC, AN ARIZONA LIMITED
8 LIABILITY CORPORATION; GLOBAL WATER
9 – PALO VERDE UTILITIES COMPANY, AN
10 ARIZONA CORPORATION; JOHN AND JANE
11 DOES I-20; ABC ENTITIES I-XX,

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
RESPONDENTS.

1 IN THE MATTER OF THE JOINT
2 APPLICATION OF CP WATER COMPANY
3 AND FRANCISCO GRANDE UTILITIES
4 COMPANY TO TRANSFER THEIR
5 CERTIFICATES OF CONVENIENCE AND
6 NECESSITY AND ASSETS TO PALO VERDE
7 UTILITIES COMPANY AND SANTA CRUZ
8 WATER COMPANY.

Docket No. WS-01775A-07-0485

Docket No. SW-03575A-07-0485

Docket No. W-02442A-07-0485

Docket No. W-03576A-07-0485

REBUTTAL TESTIMONY OF

GRAHAM SYMMONDS

IN SUPPORT OF SETTLEMENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

TABLE OF CONTENTS

I. Introduction.....3

II. Approval of Settlement Agreement and Planning Areas3

III. Recycled Water6

IV. Requests for Service7

V. Response to Staff Conditions9

1 **I. Introduction.**

2
3 **Q. Please summarize your rebuttal testimony.**

4 A. I agree with many of Staff's recommendations, and I appreciate their consideration of our
5 proposals. However, I do disagree with a few of their recommendations.
6

7 I recommend that the Commission approve the Settlement Agreement in this case, which
8 will resolve long-standing litigation in a manner consistent with the public interest. I also
9 recommend that the Commission approve the planning areas described in the Settlement
10 Agreement. I explain how Staff's apparent position on recycled water may create barriers
11 to expansion of recycled water use in Arizona. I also describe how Staff's position on
12 requests for service is inconsistent with previous Commission decisions on that topic.
13 Lastly, I will address the conditions recommended by Staff.
14

15 **II. Approval of Settlement Agreement and Planning Areas.**

16
17 **Q. Why should the Commission approve the Settlement Agreement?**

18 A. The Settlement Agreement includes a landmark provision that will involve Arizona Water
19 in providing recycled water within its water certificate areas. The proposed certificate
20 extensions will add adjacent areas to the existing certificates of established utilities with
21 proven track records. Moreover, the Settlement Agreement will resolve years of vigorous
22 litigation between Arizona Water and the Global Utilities. Full litigation of these disputes
23 would require massive resources by the parties, Staff, and the Commission.
24
25
26
27

1 Q. What does Staff recommend?

2 A. Staff recommends that the Commission deny approval of the Settlement Agreement. Staff
3 states that approval of the planning areas would be "implicit reservation of service
4 territories for Global and Arizona Water."

5
6 Q. Do you agree?

7 A. No. The Settlement does not impact the rights of third parties. Moreover, if implicit
8 reservation is a concern, the Commission could include language in its decision clearly
9 stating that there is no such reservation, either express or implied.

10

11 Q. Staff also expresses concern regarding implied approval of costs. Please respond.

12 A. Staff states that approval of the settlement agreement and its planning areas may constitute
13 pre-approval of the prudence of any facilities built to serve the planning areas. I disagree.
14 Prudence of any facilities would be determined in a rate case. Pre-approval of prudence is
15 very rare; it can occur when the Commission expressly states it is giving pre-approval. In
16 addition, pre-approval may be implied from a Commission order that expressly requires
17 that a certain facility be built, because it is always prudent to comply with Commission
18 orders. Approval of a planning area is very different because such an approval would not
19 specify any particular facilities that must be built.

20

21 Further, under the Commission's rules, prudence is determined "at the time... investments
22 were made" based on "all relevant conditions known or which in the exercise of reasonable
23 judgment should have been known" at that time. A.A.C. R14-2-103.A.3.1. Thus, prudence
24 is not determined when a planning area is approved.

25

26

27

1 Moreover, if the Commission were concerned about any implication of pre-approval of
2 prudence, the Commission could include language in its decision disavowing any finding
3 of prudence, as is often done in decisions approving loans.
4

5 **Q. What other objections does Staff make to approval of the Settlement Agreement?**

6 A. Staff states that growth could develop in unexpected patterns, or that Arizona Water or the
7 Global Utilities could fail the "fit and proper" test for certificate extensions, or that a utility
8 with lower costs could emerge, or that disputes could arise in the future. I disagree with
9 these concerns.
10

11 It is true that growth could develop in unexpected ways. But the planning areas are based
12 on proximity to the existing certificate areas of the Global Utilities and Arizona Water.
13 Due to this proximity, it is highly likely that the utility with the planning area will be in the
14 best position to serve the future growth. And if that is not the case, the Commission could
15 grant the certificate to another utility. The planning areas do not create an entitlement to a
16 certificate extension; rather any certificate extension in the planning areas would be judged
17 by the same standards as any other certificate extension. No special rights are created.
18

19 Likewise, Staff's concerns with a possible future failure of the "fit and proper" test, or the
20 emergence of a new utility with lower costs, can be addressed in future certificate cases. A
21 utility that is not "fit and proper" will not receive a certificate extension. And if a future
22 utility with lower costs enters the area, it can apply for a certificate extension in the
23 planning area. Again, the planning areas only apply between the Global Utilities and
24 Arizona Water.
25
26
27

1 **Q. What about Staff's concern about future conflicts?**

2 A. It is true that if the Commission approves the planning areas, there could be future disputes
3 between Arizona Water and the Global Utilities concerning the planning areas. But such
4 disputes would be unlikely, because they would happen only if one of the parties violates
5 the Settlement Agreement. In contrast, if there were no planning areas, future conflicts
6 between the Global Utilities and Arizona Water over these areas becomes more likely.
7 And future conflicts are not the only concern – the Settlement Agreement will resolve the
8 current conflict between Arizona Water and the Global Utilities.

9
10 **Q. Staff also states that planning for expansion is the job of utility management. What is
11 your response?**

12 A. I agree. But Commission approval of the Settlement Agreement and the Planning Areas
13 will greatly assist the management of the Global Utilities and Arizona Water. Our
14 executives and local managers will know where to focus their planning efforts. And we
15 will be able to spend our time planning for and managing the growth of our utilities, rather
16 than spending our time and resources fighting with each other.

17
18 **III. Recycled Water.**

19
20 **Q. What does the Settlement Agreement say about recycled water?**

21 A. The Settlement Agreement contains an innovative provision to promote the use of recycled
22 water in the "Overlap Areas" (the areas where Arizona Water will have the water
23 certificate and Global Water – Palo Verde Utilities Company will have the wastewater
24 certificate.) In those areas, Arizona Water has the right to buy the recycled water produced
25 by Palo Verde and then distribute and sell it to its customers.
26
27

1 **Q. What does Staff say about this provision?**

2 A. Staff states that this provision amounts to Palo Verde "contracting away" its obligation to
3 provide service.
4

5 **Q. How do you respond?**

6 A. This may be the result of a misunderstanding. It was always the parties' intention that
7 Arizona Water have the certificate rights (and thus the obligation to serve) to provide
8 recycled water in the Overlap Areas. Palo Verde would have nothing to "contract away."
9 To the extent that Staff objects to Arizona Water having those certificate rights, I strongly
10 disagree.
11

12 Staff also considers a scenario were Global Water – Palo Verde Utilities Company holds
13 the wastewater certificate within AWC's planning area, but the water certificate is awarded
14 to another utility. Staff expresses concern that, under this scenario, Section 7.a of the
15 Settlement Agreement would prohibit Palo Verde from selling recycled water within the
16 areas awarded to the other utility. Staff's scenario is unlikely, but if it comes to pass,
17 Arizona Water would not have legal authority to be the "retail provider of recycled water"
18 as contemplated in Section 7.a. In that case, Section 7.a would simply not apply, and Palo
19 Verde would provide the retail recycled water service.
20

21 I believe that the recycled water aspects of the settlement are innovative and highly
22 beneficial. In the past, some Commissioners have criticized Arizona Water for not buying
23 and distributing recycled water. To me, this seems to be an instance of a utility taking the
24 Commission's concerns to heart and changing its actions. That should be encouraged, not
25 condemned.
26
27

1 **IV. Requests for Service.**

2
3 **Q. What does Staff recommend concerning requests for service?**

4 A. Staff recommends that areas with a “stale” request for service and no “renewed” requests
5 be excluded from the certificate extensions. Staff also recommends that certificate
6 extensions be granted only where requests for service exist for both water and wastewater
7 service.

8
9 **Q. Please respond to Staff’s recommendation concerning “renewed” requests.**

10 A. There is a recent Commission decision that is not consistent with Staff’s recommendation.
11 In Decision No. 70381 (June 13, 2008), the Commission granted a certificate extension to
12 the Global Utilities. As in this case, Staff requested renewed requests for service. The
13 Global Utilities presented original requests for service for 100% of the requested extension
14 area, and renewed requests for 71% of the extension area. (Decision No. 70381 at Finding
15 of Fact No. 36). The Commission found that this was sufficient, and granted the Global
16 Utilities a certificate extension for 100% of the requested extension area. The Commission
17 stated that “the Applicants have demonstrated that there is a need for service in the
18 proposed extension area through requests for service.... We find that all 47 of the original
19 requests for service should be included in the Companies’ request to extend their respective
20 CC&Ns.” (Id.)

21
22 Here, the Global Utilities have original requests for service for 100% of the requested
23 extension area, and renewed or recent requests for 77.5% of that area (25,002.14 acres out
24 of 33,273 total acres). This exceeds the percentage of renewed requests in Decision No.
25 70381. Thus, the Global Utilities have demonstrated need for their requested certificate
26 extensions, and the Commission should approve the Global Utilities’ requested extensions
27

1 in full.

2 **Q. Please respond to Staff's recommendation that requests for service for both types of**
3 **services be required.**

4 A. I disagree. Traditionally, a water utility has been required to have requests for water
5 service. And wastewater utilities have been required to have requests for wastewater
6 service. I am not aware of any precedent for requiring a utility that provides only one of
7 these services to have requests for both services.

8
9 **Q. Have the Global Utilities received additional renewed requests for service?**

10 A. Yes, the additional renewed requests are attached as Attachment Symmonds-Rebuttal-1,
11 and an updated map showing the location of renewed requests for service is attached as
12 Attachment Symmonds-Rebuttal-2.

13
14 **V. Response to Staff Conditions.**

15
16 **Q. Do you agree with Staff's proposed conditions?**

17 A. In large part, yes. However, the Global Utilities are concerned that Arizona's state budget
18 situation may cause a delay in obtaining some of the permits, due to budget cuts. Thus, the
19 Global Utilities recommend that the Approval to Construct be due not later than December
20 31, 2013 and that the Designation of Assured Water Supply be due not later than December
21 31, 2012.

22
23 Staff also proposes a due date for the Section 208 approval. However, the proposed
24 extension area is included within the Global Utilities' current Section 208 plan area; thus
25 no condition is needed. A map showing the Global Utilities' approved Section 208 plan
26 area is attached as Attachment Symmonds-Rebuttal-3

Symmonds Attachment "1"

Status of Request for Service letters for the SESA

Developer/Development	ICFA recorded	Status of New RFS	approximate acres	approximate units	acres received	
Santa Cruz/Palo Verde						
2 Stanfield Estates / Turner Dunn	yes	no reply	95	334		
3 Dart Property / Terry Button	yes	no reply	620	2,170		
4 Santa Cruz Land Co / Santa Cruz Ranch / Anderson Val Vista 6	yes	received	1,188	4,157	1,188	
5 SCR, LLC / Scott Cole & Bryan Hartman	yes	received	674	2,359	674	
6 JP Holdings LP / Solana Ranch North	yes	received	667	2,335	667	
7 Anderson & Barnes 580 LLP / Solana Ranch South	yes	received	580	2,030	580	
8 120 Townsend (Yount)	yes	received	200	700	200	
9 NS120 (Yount)	yes	received	120	420	120	
10 Montgomery 156 (Yount)	yes	received	156	546	156	
11 CG 215 (Yount)	yes	received	215	753	215	
12 Casa Grande Montgomery 240 (Yount)	yes	received	240	840	240	
13 RRY Casa Grande 320 (Yount)	yes	received	320	1,120	320	
14 SVVM 80 (Yount)	yes	received	80	280	80	
15 VV Monty (Yount)	yes	received	60	210	60	
16 RRY Real Estate (Yount)	yes	received	40	140	40	
17 Robin R Yount LTD (Yount)	yes	received	40	140	40	
18 Richard and Dana (Yount)	yes	received	40	140	40	
19 Bruce and Karen (Yount)	yes	received	40	140	40	
20 Sacaton BL (Yount)	yes	received	280	980	280	
21 Trading Post Road LLC (Yount)	yes	received	60	210	60	
22 Chartwell Casa Grande (Yount)	yes	received	40	140	40	
23 Gallup Financial (Commercial)	yes	received	1,216	4,256	1,216	
24 Gallup Financial (Residential)	yes	received	1,484	5,194	1,484	
25 CRW Holdings, LLC	yes	no reply	30	105		
26 Val Vista & Montgomery (Mark Williams)	yes	received	40	140	40	
27 Williams Trusts (Mark Williams)	yes	received	160	560	160	
28 Blevins	yes	no reply	160	560		
29 Kronwald Family Trust	yes	no reply	80	280		
30 Henry McMillan and Alexander McMillan	yes	no reply	25	88		
31 Teel 80 (Reinbold)	yes	received	82	287	82	
32 Ken Lowman	yes	no reply	80	280		
34 Kasson and Company	NO	New	125	438	125	
35 Val Vista & Midway	NO	New	40	140	40	
36 William MacKenzie	NO	New	77	270	77	
37 Maricopa Weber	NO	New	283	991	283	
43 Langley Properties (Stanmar 160)	yes	received	160	560	160	
			9,798	34,292	8,707	89%
Palo Verde only						
1 Carranza Associates / Turner Dunn	yes	waiting	80	280		
33 Hampden and Chambers	yes	received	807	2,825	807	
38 ROB-LIN Marketing (Sundt)	yes	received	1,228	4,298	1,228	
39 Vistoso Partners / Jorde Hacienda	yes	no reply	3,120	10,920		
40 ABCDW, LLC (Vistoso Stanfield 1942)	yes	received	1,942	6,797	1,942	
41 Vanderbilt Farms, LLC (Thude/Vistoso)	yes	received	1,920	6,720	1,920	
42 Langley Stanfield Estates (Hay Hollow)	yes	received	441	1,544	441	
44 Langley Properties (CCB Standfield Estates)	yes	waiting	96	336		
45 Terbus Investments	yes	no reply	40	140		
46 Douglas Payne	yes	no reply	80	280		
47 Matt Montgomery/SPD, INC	yes	no reply	1,200	4,200		
48 El Dorado: Parker Estates	yes	received	640	2,240	640	
49 El Dorado: Hondo 640	yes	received	640	2,240	640	
50 El Dorado: Rio Lobo, LLC	yes	received	640	2,240	640	
51 El Dorado: Big Trail, LLC / Dunmar Farms / B Bennett	NO	received	640	2,240	640	
52 El Dorado: Lonely Trail 780	NO	received	780	2,730	780	
53 Langley Properties (Talla West)	NO	waiting	431	1,509		
54 Langley Properties (south part of jv with wolfswinkle)	NO	waiting	843	2,951		
55 Selma & Midway	NO	New	221	774	221	
56 Stanfield 370	NO	no reply	370	1,295		
57 BET, Inv.	NO	received	60	210	60	
			15,332	53,664	9,152.14	60%
58 Legends	yes	received	7,143	25,000	7,143	100%

*updated 5/8/09

May 1, 2009

Global Water – Santa Cruz Water Company
Global Water – Palo Verde Utilities Company
Attn: Ms. Cindy Liles
21410 N. 19th Ave., Ste. 201
Phoenix, AZ 85027

RE: Request for Services from
Global Water – Santa Cruz Water Company
Global Water – Palo Verde Utilities Company

Dear Ms. Liles:

Teel 80, LLC owns the property described in Exhibit A attached hereto and we hereby request water, wastewater, and recycled water service for this property from Global Water – Santa Cruz Water Company and/or Global Water – Palo Verde Utilities Company. Teel 80, LLC has a future need for this service for this property.

Teel 80, LLC is continuing to pursue future development for this property. The current status of development activity for this property is on hold. Additionally, we do not have plans for golf courses within our development.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Russ Lathem', written over a horizontal line.

By: Russ Lathem, Member Manager
Teel 80, LLC
11075 E. Cortez St.
Scottsdale, AZ 85259
480-214-9604

EXHIBIT A

PARCEL NO. 1:

THAT PORTION OF THE WEST HALF OF THE WEST HALF OF THE SOUTHEAST QUARTER OF SECTION 25, TOWNSHIP 5 SOUTH, RANGE 3 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTH QUARTER CORNER OF SECTION 25;

THENCE NORTH 00 DEGREES 36 MINUTES 49 SECONDS EAST ALONG THE WEST LINE OF SAID SOUTHEAST QUARTER, A DISTANCE OF 1580.97 FEET TO THE TRUE POINT OF BEGINNING;

THENCE CONTINUING NORTH 00 DEGREES 36 MINUTES 49 SECONDS EAST, A DISTANCE OF 1267.58 FEET TO THE CENTER OF SECTION 25 MARKED BY A 1/2 INCH IRON PIN;

THENCE SOUTH 82 DEGREES 44 MINUTES 30 SECONDS EAST ALONG THE NORTH LINE OF SAID SOUTHEAST QUARTER, A DISTANCE OF 650.75 FEET TO A POINT;

THENCE SOUTH 00 DEGREES 32 MINUTES 20 SECONDS WEST, A DISTANCE OF 1405.95 FEET;

THENCE NORTH 84 DEGREES 21 MINUTES 45 SECONDS WEST, A DISTANCE OF 645.68 FEET TO A POINT;

THENCE NORTH 01 DEGREES 12 MINUTES 58 SECONDS WEST, A DISTANCE OF 157.21 FEET TO THE TRUE POINT OF BEGINNING;

EXCEPT ALL OIL, GAS AND OTHER MINERALS AS RESERVED IN DEED RECORDED IN DOCKET 115, PAGE 57, OFFICIAL RECORDS.

PARCEL NO. 2:

THAT PORTION OF THE WEST HALF OF THE WEST HALF OF THE SOUTHEAST QUARTER OF SECTION 25, TOWNSHIP 5 SOUTH, RANGE 3 EAST OF THE GILA AND SALT RIVER BASE AND MERIDIAN, PINAL COUNTY, ARIZONA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTH QUARTER CORNER OF SECTION 25;

THENCE SOUTH 85 DEGREES 59 MINUTES 00 SECONDS EAST ALONG THE SOUTH LINE OF SECTION 25, A DISTANCE OF 50.69 FEET TO THE TRUE POINT OF BEGINNING;

THENCE NORTH 01 DEGREES 12 MINUTES 58 SECONDS WEST, A DISTANCE OF 1427.58 FEET TO A POINT;

33
May 7, 2009

Global Water – Palo Verde Utilities Company
Attn: Ms. Cindy Liles
21410 N. 19th Ave., Ste. 201
Phoenix, AZ 85027

RE: Request for Wastewater Services from
Global Water – Palo Verde Utilities Company

Dear Ms. Liles:

Hampden and Chambers LLC and BevNorm Olive LLC, both limited liability companies managed by Bruce C. Galloway, owns the property described in Exhibit A attached hereto and we hereby request wastewater service for this property from Global Water – Palo Verde Utilities Company. Hampden and Chambers LLC and BevNorm Olive LLC have a current need for this service for this property.

Hampden and Chambers LLC and BevNorm Olive LLC are continuing to pursue development for this property.

Sincerely yours,

Hampden and Chambers Limited Liability Company
a Colorado Limited Liability Company

By: 

Bruce Galloway, Manager

BevNorm Olive, LLC
an Arizona Limited Liability Company

By: 

Bruce Galloway, Manager

EXHIBIT A

Stanfield I-8 Legal Descriptions

Parcel No. 1 (500-14-001B):

The Southwest quarter of the Northeast quarter of Section 8, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona.

Parcel No. 2 (500-14-001C):

The North 130 feet of Section 8, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona;

Parcel No. 3 (500-14-001D):

The North half of the North half of Section 8, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona;

EXCEPT the North 130 feet thereof.

Parcel No. 4 (500-14-002B):

The North half of the Southeast quarter of the Northeast quarter AND the Southwest quarter of the Southeast quarter of the Northeast quarter of Section 8, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona.

Parcel No. 5 (500-14-002C):

The Southeast quarter of the Southeast quarter of the Northeast quarter of Section 8, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona.

Parcel No. 6 (500-60-001A):

The West 155 feet of the East 188 feet and the North 130 feet of the East 33 feet of the North half of the North half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona.

Parcel No. 7 (500-60-001B):

The North half of the North half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona, lying East of the Santa Rosa Canal.

EXCEPT the West 155 feet of the East 188 feet and the North 130 feet of the East 33 feet thereof.

Parcel No. 8 (500-60-002):

The North half of the North half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona, lying West of the Santa Rosa Canal.

Parcel No. 9 (500-60-003):

A portion of the South half of the North half AND the South half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona, lying North and East of the Santa Rosa Canal, as set forth in Document recorded in Docket 1357, page 568, records of Pinal County, Arizona.

Parcel No. 10 (500-60-004):

The South half of the North half AND the South half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona, lying South and West of the Santa Rosa Canal, as set forth in Document recorded in Docket 1357, page 568, and North of Interstate 8, as set forth in Document recorded in Docket 317, pages 378 and 381, records of Pinal County, Arizona.

Parcel No. 11 (500-60-005):

The South half of the South half of Section 7, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona, lying South of the Interstate I-8 Highway as conveyed to the State of Arizona, by and through its Highway Department recorded in Docket 317, page 378, records of Pinal County, Arizona.

EXCEPT all coal and other minerals as reserved in the Patent to said land.

BET Investments

2600 Philmont Avenue, Suite 212
Huntingdon Valley, PA 19006
Phone: (215) 938-7300
Fax: (215) 938-8651

January 13, 2009

Ms. Cindy Liles
Global Water - Palo Verde Utilities Company
21410 N. 19th Avenue, Suite 201
Phoenix, AZ 85027

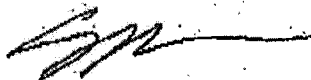
RE: Request for Services from BET Investments, Inc.
Global Water - Palo Verde Utilities Company
Stanfield 60, Arizona

Dear Ms. Liles:

BET Investments, Inc.(BET), owns the property described in Exhibit A attached hereto, and we hereby request wastewater and recycled water service for this property from Global Water - Palo Verde Utilities Company. BET has a current need for this service for this property.

BET is continuing to pursue development for this property with an anticipation of building. The property has been rezoned and has an approved tentative plat. Additional, we do not have plans for golf courses within our development.

Sincerely yours,



Scott Moore
Executive Vice President
9233 E. Via De Vaquero Drive
Scottsdale, Arizona 85255
480-563-3891

May 30, 2006

LEGAL DESCRIPTION FOR
STANFIELD 60
GROSS BOUNDARY

The South Half of the Northeast Quarter of the Southeast Quarter and the Southeast Quarter of the Southeast Quarter of Section 12, Township 6 South, Range 3 East of the Gila and Salt River Meridian, Pinal County, Arizona, more particularly described as follows:

Beginning at the G.L.O. Brass Cap marking the Southeast Corner of said Section 12, from which the 1-1/2" Iron Bar marking the East Quarter Corner of said Section 12 bears North 00°00'39" East, a distance of 2,640.47 feet;

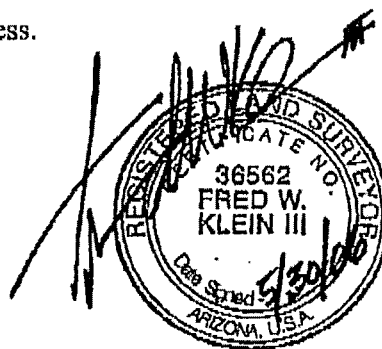
Thence South 89°54'33" West, along the South line of the Southeast Quarter of said Section 12, a distance of 1,321.43 feet to the Southwest Corner of the Southeast Quarter of the Southeast Quarter of said Section 12;

Thence North 00°00'19" West, along the West line of the Southeast Quarter of the Southeast Quarter and the West line South Half of the Northeast Quarter of the Southeast Quarter, a distance of 1,980.66 feet to the Northwest Corner of the South Half of the Northeast Quarter of the Southeast Quarter of said Section 12;

Thence North 89°55'21" East, along the North line of the South Half of the Northeast Quarter of the Southeast Quarter, a distance of 1,321.99 feet to the Northeast Corner thereof;

Thence South 00°00'39" West, along the East line of the Southeast Quarter of said Section 12, a distance of 1,980.35 feet to the Point of Beginning.

Containing 60.093 Acres, more or less.





May 6, 2009

Global Water – Palo Verde Utilities Company
Attn: Ms. Cindy Liles
21410 N. 19th Ave., Ste. 201
Phoenix, AZ 85027

RE: Request for Services from
Global Water – Palo Verde Utilities Company

Dear Ms. Liles:

Langley Stanfield Estates owns the property described in Exhibit "A" attached hereto and we hereby request wastewater service from Global Water – Palo Verde Utilities Company. Langley Stanfield Estates, LLC has a current need for this service for this property.

Langley Stanfield Estates, LLC will continue to pursue development for this property. We are currently in the process of land use planning and entitlement.

If you have any questions regarding this matter, please do not hesitate to contact our office.

Sincerely,

Langley Stanfield Estates, LLC

By: Langley Farm Investments, LLC
Its: Manager

By: 
Steven G. Rees
Its: Manager

Exhibit "A"
Legal Description

PARCEL NO. 1:

The West Half of the South Half of the South Half of Section 3, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona.

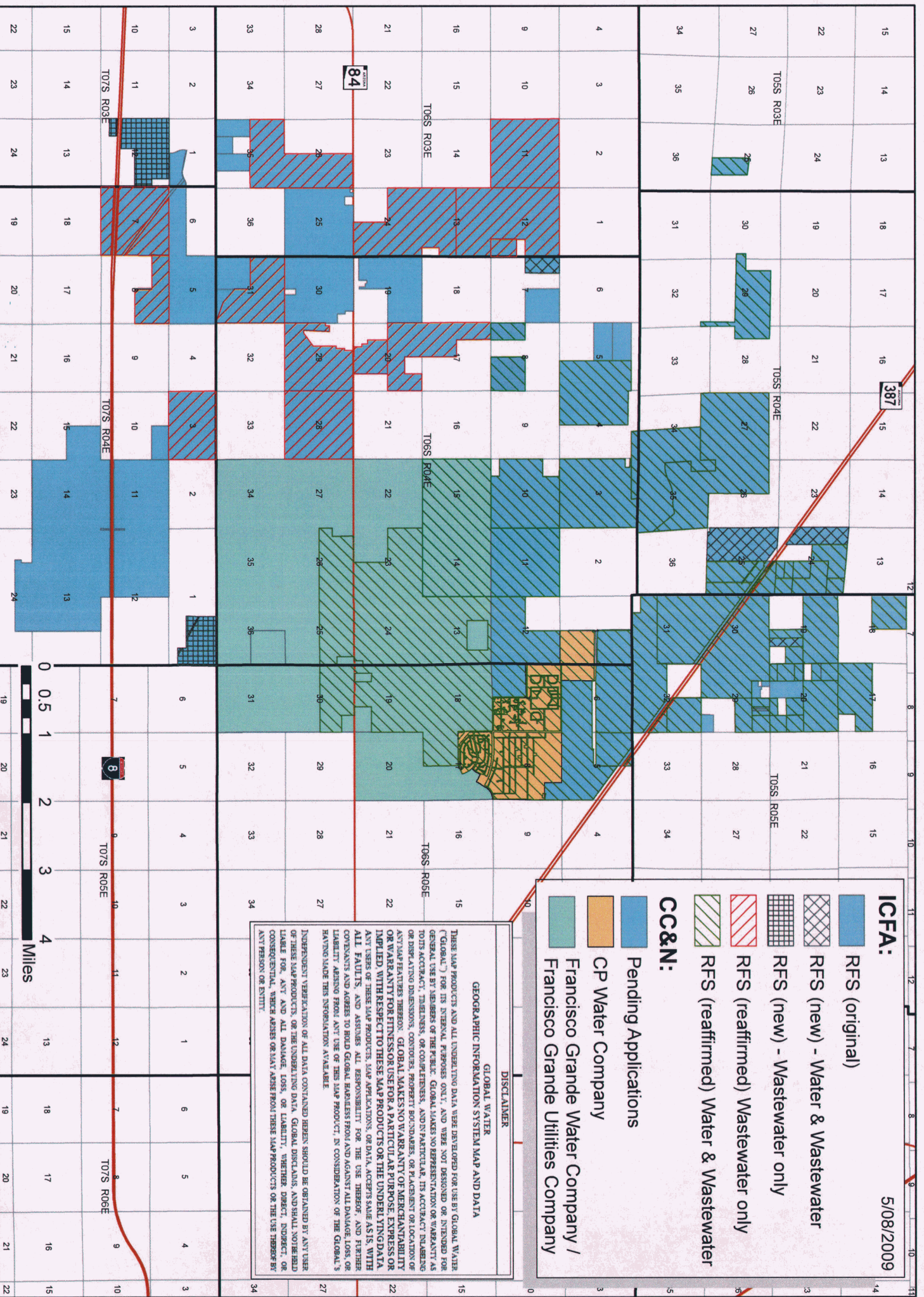
PARCEL NO. 2:

Lots 3 and 4; AND the West Half of the North Half of the South Half of Section 3, Township 7 South, Range 4 East of the Gila and Salt River Base and Meridian, Pinal County, Arizona;

EXCEPT all coal and other mineral deposits, as reserved in the Patent from the United States of America.

Symmonds Attachment "2"

Updated Request For Service Areas



ICFA:

5/08/2009

- RFS (original)
- RFS (new) - Water & Wastewater
- RFS (new) - Wastewater only
- RFS (reaffirmed) Wastewater only
- RFS (reaffirmed) Water & Wastewater
- Pending Applications
- CP Water Company
- Francisco Grande Water Company / Francisco Grande Utilities Company

CC&N:

DISCLAIMER

**GLOBAL WATER
GEOGRAPHIC INFORMATION SYSTEM MAP AND DATA**

THESE MAP PRODUCTS AND ALL UNDERLYING DATA WERE DEVELOPED FOR USE BY GLOBAL WATER ("GLOBAL") FOR ITS INTERNAL PURPOSES ONLY, AND WERE NOT DESIGNED OR INTENDED FOR GENERAL USE BY MEMBERS OF THE PUBLIC. GLOBAL MAKES NO REPRESENTATION OR WARRANTY AS TO THE ACCURACY, TIMELINESS, OR COMPLETENESS, OR INDEMNITY, OR PLACEMENT OR LOCATION OF ANY FEATURES THEREON. GLOBAL MAKES NO WARRANTY OF MERCHANTABILITY OR FITNESS FOR USE FOR A PARTICULAR PURPOSE, EXPRESS OR IMPLIED, WITH RESPECT TO THESE MAP PRODUCTS OR THE UNDERLYING DATA. ANY USES OF THESE MAP PRODUCTS, MAP APPLICATIONS, OR DATA, ACCEPTS AS IS, WITH ALL FAULTS, AND ASSUMES ALL RESPONSIBILITY FOR THE USE THEREOF, AND FURTHER COVENANTS AND AGREES TO HOLD GLOBAL HARMLESS FROM AND AGAINST ALL DAMAGE, LOSS, OR LIABILITY ARISING FROM ANY USE OF THIS MAP PRODUCT, IN CONSIDERATION OF THE GLOBAL'S HAVING MADE THIS INFORMATION AVAILABLE.

INDEPENDENT VERIFICATION OF ALL DATA CONTAINED HEREIN SHOULD BE OBTAINED BY ANY USER OF THESE MAP PRODUCTS, OR THE UNDERLYING DATA, GLOBAL DISCLAIMS, AND SHALL NOT BE HELD LIABLE FOR, ANY AND ALL DAMAGE, LOSS, OR LIABILITY, WHETHER DIRECT, INDIRECT, OR CONSEQUENTIAL, WHICH ARISES OR MAY ARISE FROM THESE MAP PRODUCTS OR THE USE THEREOF BY ANY PERSON OR ENTITY.

0 0.5 1 2 3 4 Miles

Symmonds Attachment “3”



GLOBAL WATER
RELIABLE • RENEWABLE • REUSABLE

Global Water - Palo Verde Utilities Company CAAG 208 BOUNDARY

